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April 5, 2001

Office of the Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TW-A325
Washington, DC 20554

Re: Opposition to the Petitions for Reconsideration of "The Use of N11 Codes and other Abbreviated Dialing Arrangements", CC Docket No. 92-105

The Ann Arbor Transportation Authority(AATA) is working with The Michigan Department of Transportation and The Southeast Michigan Council of Governments to get a statewide 511 program up and running. Attached please note a brief overview of the case study now being developed.

Once the FCC issued the 511 order our Transit system, which is already outfitted with an Advanced Operating system consisting of a complete suite of ITS components issuing real time information, started making plans to utilize the 511 opportunity. This is a tremendous chance to get vital information to the traveling public so they can have before them mobility options. Enhancing the traveler experience, granting vital information from a simple phone call is paramount for helping our growing nation to better accommodate our citizens travel on the road and highway system and through the utilization of public transportation systems with their vans, buses, light rail and heavy rail.

I am participating in the 511 Policy Committee as Vice Chair and proud to be a part of an effort to bring public and private groups, including the wireless community, together to make this a reality throughout the Nation. Knowing that we have brought together The American Association of State Highway and Transportation Officials(ASHTO), the American Public Transportation Association (APTA), ITS America and the Federal Department of Transportation as well as numerous private company representatives, demonstrates the strong support for the use of 511 as the national number for traveler information.

The 511 number will be a tremendous asset to our community within our operating service area to help AATA sustain our obligation to protect the safety of the traveling public. Connected with our real time information the 511 number will allow the public to get information on how to best utilize public transit with minimal waiting and great connectivity to places they need to travel.

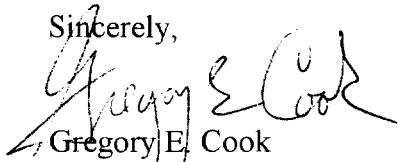
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Public Transportation Systems could never ask for anything better than 511 to extend our service capability in a safe, efficient manner.

We expect that a majority of calls to the 511 system will come from mobile phones. Wireless carriers are a vital part of 511 and are true partners in ensuring that we all succeed implementing 511 as the FCC has visioned. Permitting wireless carriers to "opt out" of assignment would fatally flaw efforts to deploy 511 nationwide in any meaningful manner. I realize that technical questions must still be answered and will be with the wireless community involved in helping this to succeed.

I will close stating that in my thirty years of managing public transportation systems I have never seen a greater opportunity to assist the traveling public or utilizing buses and trains across our great country than the 511 opportunity FCC has given us. We are working hard to make it work now. It will not be a government monopoly but a coordinated effort so our public will know that whether they make their 511 call for traveler information in Ann Arbor, Michigan or anywhere else they may utilize a land line or mobile phone and get the information they need in a format they will understand from wherever they may be.

Sincerely,



Gregory E. Cook
CEO/Executive Director

Attachment

copy to: AATA Board of Directors

511 Case Study Overview – Greater Detroit Region

At least thirteen traffic, transit, and transportation-information telephone systems are currently in operation in the southeastern Michigan / Windsor, Ontario region. The focus of this case study was specifically on the three county area - Wayne, Oakland, and Macomb – which is a subset of the region's seven county Southeast Michigan Council of Governments (SEMCOG).

Michigan DOT's MITS Center is the clearinghouse for real-time freeway information for greater Detroit and the real-time ITS and incident information collected at the MITS Center is the most pertinent for a near term 511 phone system when initiated in Southeastern Michigan. MDOT's only existing statewide phone system provides construction information for the state highway system by dialing toll free 800-641-MDOT.

511 Vision

The Michigan Department of Transportation has identified that the successful implementation of 511 statewide requires a consolidation of all currently operating traveler information telephone numbers under a single point of contact. It is envisioned that Michigan's future statewide 511 system would be anchored by two regional 511 service areas – Detroit/SEMCOG and Grand Rapids - overlaid by a statewide default system (possibly an enhanced version of the existing statewide construction hotline) in all other areas of Michigan. The granularity of the rural area information should not be expected to be the same as within the Detroit and Grand Rapids areas. The greater Detroit area 511 should include southern Ontario in its watershed.

Ongoing Activities

MDOT has decided to do a one-year 511 pilot program before accepting competitive bids. It is anticipated that the pilot program would begin in the greater Detroit area and possibly cover the entire seven-county SEMCOG region.

- Kick-off Session – Ameritech (the major ILEC for Michigan) and MDOT will host a meeting of all appropriate agencies to discuss all of the major 511 implementation issues.
- Implementation Plan – MDOT will develop an action plan and Ameritech will file a tariff with the MPSC for 511; all other LECs and the wireless carriers would need to decide on filing own tariffs to connect to main service (Ameritech).

Lessons Learned

- Lead implementing agency must consider all available public transportation providers
- Service across both state lines and international borders must be ensured
- Strong public awareness and marketing campaigns should accompany 511 implementation
- Private sector transportation providers should be consulted throughout all phases of deployment

As this case study is under development, the full report is not yet available.